

**INDICTMENT**

CAUSE NO. 50953-B

THE STATE OF TEXAS vs. SHANNON EVERETTE BROWN

DOB: 10/20/1970

OFFENSE: COUNT ONE: ENGAGING IN ORGANIZED ELECTION FRAUD (F2)  
COUNTS TWO – EIGHT: FRAUDULENT USE OF MAIL BALLOT APPLICATION ENHANCED (F3)  
COUNTS NINE – TEN: UNLAWFUL POSSESSION OF BALLOT/BALLOT ENVELOPE ENHANCED (SJF)  
COUNTS ELEVEN – EIGHTEEN: ELECTION FRAUD ENHANCED (SJF)  
COUNTS NINETEEN – TWENTY-THREE: TAMPERING WITH A GOVERNMENTAL RECORD WITH INTENT TO HARM OR DEFRAUD (SJF)

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURORS, duly selected, empaneled, sworn, charged, and organized as such for the County of Gregg, State of Texas, at the July-December, 2020 term of the 188<sup>th</sup> District Court for said County, upon their oaths present in and to said Court that from on or about the 22<sup>nd</sup> day of January A.D., 2018 and continuing until on or about the 6<sup>th</sup> day of March A.D., 2018, and anterior to the presentment of this Indictment, in the County and State aforesaid, SHANNON EVERETTE BROWN, hereinafter called Defendant, did then and there,

COUNT ONE

**Engaging in Organized Election Fraud (F2)**

with the intent to establish, maintain, and participate in a vote harvesting organization, said organization consisting of Shannon Brown, Marlana Jackson, Dewayne Ward, and Charlie Burns, who collaborated in committing election offenses under Titles 1 through 7 of the Texas Election Code, knowingly commit the offenses of illegal voting, unlawful assistance, fraudulent use of a mail ballot application multiple times in the same election, unlawful possession of a ballot or carrier envelope of another multiple times in the same election, and unlawfully assisting a voter voting a ballot by mail, by committing said offenses as the primary actor or by acting with the intent to promote or assist the commission of said offenses by soliciting, encouraging, directing, aiding, or attempting to aid members of said organization to commit said offenses,

COUNT TWO

**Fraudulent Use of Mail Ballot Application Enhanced (F3)**

And further that Defendant on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Davonia Bradley, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT THREE

**Fraudulent Use of Mail Ballot Application Enhanced (F3)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Yolita Johnson, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FOUR

**Fraudulent Use of Mail Ballot Application Enhanced (F3)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Terri Thomas, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT FIVE

**Fraudulent Use of Mail Ballot Application Enhanced (F3)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Ricky Johnson, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SIX

**Fraudulent Use of Mail Ballot Application Enhanced (F3)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Eric Taylor, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT SEVEN

**Fraudulent Use of Mail Ballot Application Enhanced (F3)**

And further that Defendant, on or about the 23<sup>rd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Robert Harvey Jr., specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

COUNT EIGHT

**Fraudulent Use of Mail Ballot Application Enhanced (F3)**



And further that Defendant, on or about the 1<sup>st</sup> day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there intentionally cause false information to be provided on an application for ballot by mail for a voter, Veronica Moore, specifically: Defendant caused the application to be marked to reflect that the voter was disabled, when in fact the voter was not disabled,

And it is further alleged that Defendant committed the offenses described in Counts Two through Eight in the same election,

COUNT NINE

**Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)**

And further that Defendant, on or about the 17<sup>th</sup> day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or carrier envelope of a voter, Davonia Bradley,

COUNT TEN

**Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)**

And further that Defendant, on or about the 6<sup>th</sup> day of March A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or carrier envelope of a voter, Tamika Buchanan,

And it is further alleged that Defendant committed the offenses described in Counts Nine and Ten in the same election,

COUNT ELEVEN

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 12<sup>th</sup> day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there, while in the presence of the ballot and during the voting process, knowingly make an effort to influence the independent exercise of the vote of Linda Carrier, specifically: Defendant influenced Linda Carrier to vote for candidate Shannon Brown for Gregg County Commissioner, Precinct 4,

COUNT TWELVE

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Yolita Johnson, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Yolita Johnson's mail ballot application to be marked "disability," when Yolita Johnson was in fact not disabled and was not eligible to vote by mail,

COUNT THIRTEEN

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Terri Thomas, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Terri Thomas' mail ballot application to be marked "disability," when Terri Thomas was in fact not disabled and was not eligible to vote by mail,

COUNT FOURTEEN

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Davonia Bradley to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Davonia Bradley's mail ballot application to be marked "disability," when Davonia Bradley was in fact not disabled and was not eligible to vote by mail,

COUNT FIFTEEN

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Eric Taylor, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Eric Taylor's mail ballot application to be marked "disability," when Eric Taylor was in fact not disabled and was not eligible to vote by mail,

COUNT SIXTEEN

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 23<sup>rd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Robert Harvey Jr., to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Robert Harvey Jr's mail ballot application to be marked "disability," when Robert Harvey Jr. was in fact not disabled and was not eligible to vote by mail,

COUNT SEVENTEEN

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 1<sup>st</sup> day of February 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Veronica Moore, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Veronica Moore's mail ballot application to be marked "disability," when Veronica Moore was in fact not disabled and was not eligible to vote by mail,

COUNT EIGHTEEN

**Election Fraud Enhanced (SJF)**

And further that Defendant, on or about the 14<sup>th</sup> day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there cause Tamika Buchanan, to obtain a ballot under false pretenses, specifically: Defendant caused the eligibility reason on Tamika Buchanan's mail ballot application to be marked "disability," when Tamika Buchanan was in fact not disabled and was not eligible to vote by mail,

And it is further alleged that Defendant committed the offenses described in Counts Eleven through Eighteen in the same election,



COUNT NINETEEN

**Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Terri Thomas, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT TWENTY

**Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Yolita Johnson, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

COUNT TWENTY-ONE

**Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)**

And further that Defendant, on or about the 22<sup>nd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams an application for ballot by mail for voter Davonia Bradley, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled.

COUNT TWENTY-TWO

**Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)**

And further that Defendant, on or about the 23<sup>rd</sup> day of January A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for voter Robert Harvey Jr., with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,


COUNT TWENTY-THREE

**Tampering with a Governmental Record with Intent to Harm or Defraud (SJF)**

And further that Defendant, on or about the 14<sup>th</sup> day of February A.D., 2018, and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly make, present, or use, with intent to harm or defraud the Gregg County election authority and candidate Kasha Williams, an application for ballot by mail for

voter Tamika Buchanan, with knowledge of its falsity and with the intent that it be taken by the election authority as a genuine governmental record, specifically: the application was false in that the eligibility reason on the application was marked "disability," when in fact the voter was not disabled,

AGAINST THE PEACE AND DIGNITY OF THE STATE.

  
Foreperson of the Grand Jury

THE STATE OF TEXAS  
COUNTY OF GREGG

I, Trey Hattaway, Clerk of the District Court within and for the County and State aforesaid, do hereby certify that the foregoing contains a true and correct copy of the Indictment in Cause No. 50953-B, of the State of Texas vs. SHANNON EVERETTE BROWN as now on file in this office.

IN TESTIMONY WHEREOF I hereto set my hand and seal, this 23<sup>rd</sup> day of Sept., A.D. 2020.

By Jammy D. [Signature]  
Deputy

\_\_\_\_\_  
Trey Hattaway  
Clerk of the District Court  
Gregg County, Texas

WITNESSES

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